SD Livestock Auction Markets Assn. Comments on Animal ID--Docket APHIS-2005-0044

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SD Livestock Auctions handle about 3 million cattle per year. Our members have researched animal identification extensively. In 2004, we had representatives of most vendors as well as a market operator that was part of USDA's animal identification pilot program.

Our experience with receiving cattle from multiple locations, handling, marketing, sorting and delivering cattle to many locations provide us a unique perspective. Unlike some markets, we sell fresh cattle. We receive, market and deliver cattle in the same day.

In April of 2005, our members identified concerns regarding animal identification that must be addressed. Further, the members agreed to the policy position stated below.

- SDLAMA is concerned that many who advocate a national animal identification system oppose country of origin labeling. Animal identification will place the burden on the United States producer. Country of origin labeling will place the burden on foreign producers and importers;
- SDLAMA is concerned that some advocates of animal identification are telling producers they will be paid more for their calves because they insert an animal ID tag;

  With or without animal identification, producers will continue to be rewarded based on the quality and performance of their cattle;
- SDLAMA is concerned about the expense of inserting animal identification tags, the cost of tag readers, the cost of computer software and hardware, and the costs of handling, storing and sharing data;
- SDLAMA is concerned that causing cattle to be further handled at a livestock auction market will increase cripples, shrink and cattle stress;
- SDLAMA is concerned about labor costs associated with reading tags, re-sorting and re-handling cattle with hard-to-read tags, and auction market labor costs associated with handling, storing and sharing data;
- SDLAMA is concerned about the lack of technology to read all brands of tags without slowing the flow of cattle;
- SDLAMA is concerned about what data will be collected and the potential of use of that information to manipulate the livestock market;
- SDLAMA is concerned about producer and livestock auction market liability associated with animal identification after the livestock has left the control of the producer or market;
- SDLAMA is concerned about the use of electronic animal identification for ownership since there is no way to visibly identify strays detected by the scanner unless cattle are individually run through the chute;
- SDLAMA is concerned about the benefit and workability of a change of ownership test at a livestock auction market since the order buyer may not know the actual owner until sometime after the sale and after the cattle have left the market;
- SDLAMA does not believe there is sufficient benefit to run cattle through a scanner to record that the cattle have been at a livestock auction market facility.
- **NOW, THEREFORE BE IT RESOLVED**, that SDLAMA is opposed to a mandatory animal identification system; and
- **BE IT FURTHER RESOLVED**, that if a voluntary animal identification system is developed that it be for animal health and food safety purposes only;
- **BE IT FURTHER RESOLVED**, that if a voluntary animal identification system is developed that it be for breeding cattle only and be controlled by each state's animal health official in cooperation with USDA;
- **BE IT FURTHER RESOLVED**, that if a voluntary animal identification system is developed, the cattle would only be read after a change of ownership and after they were received at the feeding facility of the new owner; and
- **BE IT FURTHER RESOLVED**, that if a voluntary animal identification system is developed, that livestock auction markets may provide producers with a service of installing and reading the tags if requested by the buyer or seller; and
- **BE IT FURTHER RESOLVED,** that if a mandatory animal identification system is developed, that such a system should replace all existing animal identification systems.